UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA (Alexandria Division)

GETIR US, INC.,

and

Civil Action No. 1:21-cv-1237 (RDA/TCB)

GETIR PERAKENDE LOJISTIK A.S.,

Plaintiffs,

v.

JOHN DOE

and

getir190.com, a domain name

and

190getir.com, a domain name,

Defendants.

NOTICE OF FILING MOTION TO SEAL

PLEASE TAKE NOTICE that Plaintiffs Getir US, Inc. ("Getir US") and Getir Perakende Lojistik A.S. (collectively "Getir"), by and through their undersigned attorneys and in accordance with the Local Rules of this Court, have filed a Motion for Leave to File Under Seal unredacted copies of: (1) Getir's Amended Complaint (Dkt. 21); and (2) Exhibit A to Getir's Memorandum in Support of its November 15, 2021 Emergency Ex Parte Motion for Temporary Restraining Order (Dkt. 23-1).

Parties and non-parties may submit memoranda in support of or in opposition to the motion within seven (7) Days after the filing of the motion to seal, and they may designate all or part of such memoranda as confidential.

Any information designated as confidential in a supporting or opposing memorandum will be treated as sealed pending a determination by the Court on the motion to seal.

Any person objecting to the Motion must file an objection with the Clerk within seven (7) days after the filing of the Motion to Seal. If no objection is filed in a timely manner, the Court may treat the motion as uncontested.

Dated: November 15, 2021 VENABLE LLP

/s/_

Nicholas M. DePalma (VSB No. 72886) Kevin W. Weigand (VSB No. 81073) 8010 Towers Crescent Drive, Ste 300 Tysons Corner, VA 22182

Tel: 703-905-1449 Fax: 703-821-8949

nmdepalma@venable.com kwweigand@venable.com

Roger A. Colaizzi (VSB No. 32651) 600 Massachusetts Avenue, NW Washington, D.C. 20001

Tel: 202-344-8051 rcolaizzi@venable.com

Counsel for Plaintiffs